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T-CROSS

THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

T-CROSS, a South Korean sole proprietorship,

Plaintiff,

v.

MARKETING SPECIALISTS, INC, an Arkansas
corporation,

Defendant.

Case No.: 5:08-cv-02373-RS

**STIPULATION AND [PROPOSED] ORDER
TO CONTINUE INITIAL CASE
MANAGEMENT CONFERENCE AND ADR
DEADLINES**

Pursuant to Civil Local Rule 6-2, Plaintiff T-Cross and Defendant Marketing Specialists, Inc. hereby stipulate and jointly request that the Court continue the Initial Case Management Conference and ADR deadlines. The parties jointly declare the following in support of this request:

WHEREAS, the Initial Case Management Conference is presently scheduled for September 3, 2008 at 2:30 P.M.;

WHEREAS, the parties are pursuing mediation through JAMS, presently scheduled for August 22, 2008, and believe that an extension of time for the Case Management Conference and ADR deadlines in this matter may aid the parties in their efforts to resolve this litigation and conserve the resources of the Court and the parties;

WHEREAS, the parties have not sought any previous modification to the Order Setting Initial Case Management Conference and ADR Deadlines, and the only previous time modifications

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Stipulation and [Proposed] Order to Continue Initial Case Management Conference and ADR Deadlines
T-Cross v. Marketing Specialists, Inc.
Case No.: 5:08-cv-02373-RS

1 stipulated by the parties in this case have been to extend the time for Defendant Marketing
2 Specialists, Inc. to respond to the Complaint pursuant to Civil Local Rule 6-1(a);

3 WHEREAS, the parties have conferred and mutually agreed that they are available for an
4 Initial Case Management Conference on September 24, 2008;

5 NOW THEREFORE, the parties through their undersigned counsel hereby stipulate and
6 request the Court to continue the Initial Case Management Conference to occur Wednesday,
7 September 24, 2008 or on a date as soon thereafter as is available with the Court, and that the other
8 dates scheduled in the Court's Order Setting Initial Case Management Conference and ADR
9 Deadlines are continued accordingly.

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11 **IT IS SO STIPULATED**

12 Dated: July 28, 2008


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27 Dated: July 28 2008

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ORDER

Pursuant to the stipulation of the parties, it is hereby ORDERED that the Initial Case Management Conference is reset to Wednesday, September 24, 2008, and that the other dates scheduled in the Court's Order Setting Initial Case Management Conference and ADR Deadlines are continued accordingly.

Dated: _____

Hon. Richard Seeborg
United States Magistrate Judge

CERTIFICATE OF SERVICE

I certify that on July 29, 2008, the foregoing document was filed electronically in compliance with Civil Local Rule 5-4 and General Order 45. Further, I certify that on July 29, 2008, a copy of this document was served on lead counsel for Defendant by e-mail to the address as follows:

Boyd D. Cox
E-mail: boydcox@aol.com

By: /s/ Margaux A. Aviguetero
Margaux A. Aviguetero

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